

## REMARKS/ ARGUMENTS

The foregoing amendment and the following arguments are provided to impart precision to the claims, by more particularly pointing out the invention, rather than to avoid prior art.

### 35 U.S.C. § 103(a) Rejections

Examiner rejected claims 1-15, 23-29 and 52-56 under 35 U.S.C. § 103(a) as being unpatentable by U.S. Patent No. 6,493,725 (hereinafter "Kumhyr") in view of U.S. Patent No. 5,812,122 (hereinafter "Ng").

Claim 1, as amended, reads as follows:

A method comprising :  
receiving a line of text, the line of text having a set of ordered characters having an original order and orientation;  
flipping the characters of the line of text about a display axis;  
identifying in the line of text a group of adjacent characters that share a characteristic not shared by at least one other character in the line of text; and  
flipping the characters of the group of adjacent characters about a vertical axis which passes through the group of adjacent characters so that the group of adjacent characters returns to the original order and orientation.

Neither Kumhyr nor Ng discloses these limitations. Therefore, claim 1 is patentable over Kumhyr and Ng. Specifically, neither Kumhyr nor Ng discloses flipping the characters of the group of adjacent characters about a vertical axis which passes through the group of adjacent characters so that the group of adjacent characters returns to the original order and orientation. The Examiner admits that Kumhyr does not disclose flipping characters. Therefore, the following discussion centers on Ng.

Ng discloses transforming character strings. Ng discloses two transformation windows 280 and 350 that are shown in Figures 15 and 18, respectively. When the

transformation function is activated, the transformation processes the input *character by character* until an error is encountered (Col. 9, lines 41-44, Col. 10, lines 41-46). If an error is encountered, the only output displayed is the output up until the point of the error. Therefore, the transformation function of Ng examines each character separately and continues examining one by one until an error is found, and Ng discloses a transformation function that operates character by character.

The layout window disclosed by Ng is used to control the transformation of the text (Col. 2, lines 56-63). The layout window allows a user to choose various features of the transformation, and the layout is applied to the inputted text during transformation. The layout window includes an option to allow for symmetrical swapping (Col. 7, lines 47-50). Symmetrical swapping is used to transform text segments that imply logical order (Col. 2, lines 14-19). For example, when transforming a comparator (e.g., '>'), the comparator has to be changed to accommodate the change in order. This change is made *during* the transformation of the other characters. As mentioned above, the transformation is performed character by character, but each character is only transformed once. So, as shown in the example given by Ng (Col. 2, lines 14-19), the symbol ('>') that is symmetrically swapped would not return to its original orientation, but would rather have a *different* orientation ('<') after the transformation of Ng, unlike in the claims.

Claim 1 also includes limitations of flipping the characters of the line of text *and* flipping the characters of the group of adjacent characters. Therefore, claim 1 includes two flipping operations. As mentioned above, the transformation of Ng only transforms each character once. Therefore, Ng does not disclose two flipping operations, as in claim 1.

Ng does not describe the details of the transformation. Since the transformation is made character by character, presumably each character is analyzed and transformed. The layout of Ng allows for different transformation of each character (See Fig. 10).

However, since, as mentioned above, each character is analyzed individually, Ng does not teach flipping a line of text, since each character in a string analyzed by Ng may have different transformations performed on it. Further, Ng does not disclose functionality that would allow the transformation function to “flip” characters as is claimed.

As a result of the arguments made above, the combination of Kumhyr and Ng does not teach all the limitations of claim 1. Therefore, claim 1 is patentable over Kumhyr and Ng.

Independent claims 7, 10, 13, 23, and 54, as amended, include limitations similar to those discussed regarding claim 1. For example, claim 7 includes a limitation of flipping a run of foreign characters about a center vertical axis of the run of foreign characters so that the run of foreign characters returns to the original order and orientation. For the same reasons discussed above regarding claim 1, namely that Ng does not disclose flipping to return to the original order and orientation, and that Ng only teaches on transformation, claims 7, 10, 13, 23, and 54 are also patentable over Kumhyr and Ng.

Examiner rejected claims 16-17 under 35 U.S.C. § 103(a) as being unpatentable by U.S. Patent No. 6,493,725 (hereinafter “Kumhyr”) in view of U.S. Patent No. 5,812,122 (hereinafter “Ng”) as applied to claims 40 and 46 above, and further in view of U.S. Patent No. 5,857,201 (hereinafter “Wright”).

Claims 16 and 17 depend from claim 13, and therefore include all the limitations of claim 13. As mentioned above, claim 13 is patentable over Kumhyr and Ng. Wright does not add any of the missing limitations of claim 13, as discussed above. Therefore, claims 16 and 17 are patentable over Kumhyr, Ng, and Wright.

### CONCLUSION

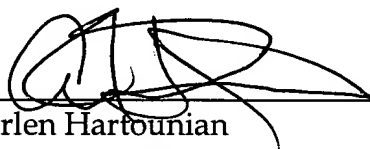
Applicants respectfully submit the present application is in condition for allowance. If the Examiner believes a telephone conference would expedite or assist in the allowance of the present application, the Examiner is invited to call Arlen M. Hartounian at (408) 720-8300.

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due.

Respectfully submitted,

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